

50-486

UNION ELECTRIC COMPANY  
1901 GRATIOT STREET  
ST. LOUIS, MISSOURI  
July 20, 1981

JOHN K. BRYAN  
VICE PRESIDENT

MAILING ADDRESS:  
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Mr. B. J. Youngblood, Chief  
Licensing Branch No. 1  
Division of Licensing  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555



Dear Mr. Youngblood:

CULTURAL RESOURCES  
CALLAWAY PLANT

As a follow-up to our letters to you dated January 30, 1981 and May 4, 1981 and in response to your letter dated December 24, 1980, we have made every effort to comply with the provisions of your letter and with all Federal and State regulatory requirements as they apply to cultural resources.

With the exception of the clarifier sludge ponds, it is our position that we are already in compliance with all applicable regulations and that all properties located within the area of "potential environmental impact" from the Callaway Plant project have been surveyed and that all archaeological sites within the impact area are preserved. This position is supported by documentation and correspondence over the last eight years including Section 11.1.1 of the Final Environmental Statement (NUREG-75/011). The Advisory Council on Historic Preservation letter to Mr. George W. Knighton dated January 5, 1976 and the Missouri State Historic Preservation Office letter to Mr. George W. Knighton dated January 16, 1976 support the conclusion made in the Final Environmental Statement and in fact commend Union Electric for its excellent work in the preservation of cultural resources. We believe that even without clear guidance from AEC (later NRC), or the Historic Survey and Planning Office (later the Office of Historic Preservation), or currently, the Historic Preservation Program Office of the Missouri Department of Natural Resources, the preservation of several sites and a substantial effort on our part to modify construction plans and protect archaeological sites during construction as early as 1972 were well above the letter or spirit of the law.

Notwithstanding the above, we agreed to proceed with Action Items 3 and 5 of your December 24, 1980 letter as a gesture of good faith in order to expedite issuance of our operating license for Callaway Plant. Our original plans called for completion of a cultural resources survey prior to the spring planting season. This has proved to be impossible due to circumstances beyond our control (i.e. excessive regulatory review time).

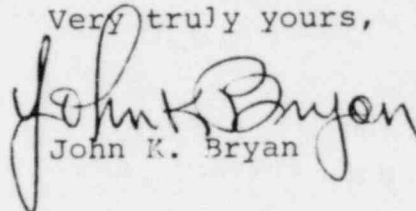
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On July 9, 1981 we met with Mr. Michael S. Weichman (Missouri Historic Preservation Program Office) to resolve any problems his office still had regarding the Survey. Mr. Weichman stated that he had no significant problem with our approach to the Survey but that he did not want us starting field work until he had approved the Research Design.

At the present time we feel we have complied with the suggestions given in your December 24, 1980 letter. We have consulted with the Missouri Historic Preservation Program Office on numerous occasions. Mr. Michael S. Weichman has commented on our Research Design and we have responded to his comments (see attached letter to Mr. Weichman dated June 23, 1981, a draft copy of which was sent to you on June 29, 1981). In that response we fully addressed all legitimate concerns raised by Mr. Weichman and, since we do not believe the law requires approval by Mr. Weichman prior to conducting field surveys, have begun limited field surveys where necessary to maintain the construction schedule. In addition, we have submitted the Research Design to NRC (May 4, 1981) for your review prior to implementation. No response from NRC has been received as of the date of this letter.

It is our desire to start the field survey on or about August 1, 1981. As stated earlier, we have addressed all received comments on the Research Design and this will be reflected in the final Research Design.

Very truly yours,

  
John K. Bryan

NGS/afg

Attachment

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